

REMARKS

Upon entry of the above amendments, claims 1 and 8 will have been amended and claims 15-20 will have been newly submitted. Further, although Applicant maintains that the combination of features, as recited in the claims, is neither anticipated nor rendered obvious by the references applied by the Examiner, Applicant has nevertheless amended the claims to enhance the clarity thereof. Thus, in addition to the previously submitted remarks, Applicant submits that the present invention, as recited in the claims, is allowable over the applied references for at least each of the reasons set forth below.

Applicant submits that the insert-nut, as recited in the claims, includes a polygonal shape defined by a plurality of sidewalls and at least one circumferentially extending groove. The sidewalls are configured to provide a plurality of gaps between the insert-nut and a surface of an installation hole of the carrier. Accordingly, plastic is injectable into each gap, which extends along the entire length of the insert-nut. With the above-mentioned configuration, the insert-nut is configured to be secured to a carrier of a car by plastic injection with relative ease and increased joint strength.

However, Applicant submits that the applied references of GAURON and QUANEY, taken alone or in combination, do not disclose or suggest, inter alia, each gap as extending along the entire length of the insert-nut, whereby plastic is injectable into the plurality of gaps, as recited in the claims.

Rather, GAURON is directed towards a fastener element that includes an outer end disk 72 sized to be snugly received within a skin opening (e.g., column 1, lines 52-

P24481.A04

54). The outer end disk 72 does not include any flat portions, but merely includes one fill opening and one vent opening. That is, in GAURON, the space between the flat portions (78, 90, and 92) and the skin opening, which the Examiner had interpreted to be the claimed gaps, do not extend along an entire length of the insert-nut.

Further, in GAURON, the non-disk portions (i.e., the flat portions 78, 90, and 92 and the fill and the vent openings) of the fastener element do not define a polygonal shape. In addition, Applicant submits that GAURON is specifically directed towards a fastener comprising disks, as the presence of disks 80, 82 (rather than the flats) enhances the mechanical interlock and the bond for an improved connection between the fastener element and the panel 12 (column 6, lines 54-59). In GAURON, there is no suggestion or motivation for modifying the disc portions to be polygonal, as proposed by the Examiner.

Furthermore, Applicant submits that QUANEY does not supply the deficiencies of GAURON. Rather, QUANEY is directed towards providing a threaded fastener of a unitary metal machined part embedded in plastic material. In other words, QUANEY does not disclose any gaps, but discloses plastic material as completely filling the space and tightly engaging the peripheral surfaces of the fastener.

Moreover, contrary to the Examiner's assertion, QUANEY does not disclose that any polygonal shape is suitable to provide resistance to torque. Rather, Applicant submits that QUANEY is directed towards providing a preferred embodiment comprising a polygon with four or less sides to provide resistance to torque (e.g., column 2, lines 49-54). In other words, QUANEY does not suggest, inter alia, providing an insert-nut

P24481.A04

with a polygonal shape comprising more than four sides, such as a pentagon or a hexagon, as recited in the claims.

Thus, as GAURON nor QUANEY, taken alone or in combination, fail to disclose or suggest the combination of features recited in the claims (e.g., an insert-nut that includes a plurality of gaps along an entire length of the insert-nut), Applicant respectfully requests passage of the present application to issue.

Furthermore, Applicant submits new claims 15-20 for the Examiner's consideration. New claims 15 and 18 recite that each gap is of uniform size and provides an inlet port for plastic injection. New claims 16 and 19 recite that the polygonal shape is sized to be substantially inscribed in the installation hole of the carrier. New claims 17 and 20 recite that each gap of the plurality of gaps is defined by adjacent vertices of the polygonal shape and a segment of the installation hole between the adjacent vertices. Accordingly, Applicants submit that new claims 15-20 are allowable for the combination of features recited therein and request an indication to such effect.

Accordingly, in view of the amendments and arguments herein, Applicant submits that claims 1 and 8 are in condition for allowance. With regard to dependent claims 2-7 and 9-20, Applicant asserts that they are allowable on their own merit, as well as because they depend either directly or indirectly from independent claims 1 and 8, which Applicant has shown to be allowable.

P24481.A04

Thus, it is respectfully submitted that all of the claims in the present application are clearly patentable over the references cited by the Examiner, either alone or in combination, and an indication to such effect is respectfully requested, in due course.

SUMMARY AND CONCLUSION

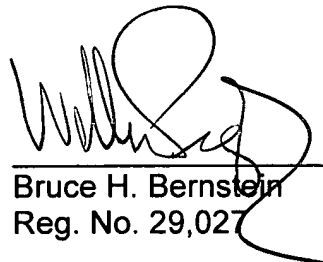
Applicant believes that the present application is in condition for allowance, and respectfully requests an indication to that effect. Applicant has amended the claims to enhance clarity and argued their allowability. Accordingly, reconsideration of the outstanding Official Action and allowance of the present application and all the recited claims therein are respectfully requested and now believed to be appropriate.

Any amendments to the claims that have been made in this amendment and that have not been specifically noted to overcome a rejection based upon the prior art should be considered to have been made for a purpose unrelated to patentability. Accordingly, no estoppel should be deemed to attach thereto.

Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

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Respectfully submitted,
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P24481.A04

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